

BEFORE THE
POSTAL REGULATORY COMMISSION

PERIODIC REPORTING
(PROPOSAL TWO)

: Docket No. RM2016-10
:
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NOTICE BY UNITED PARCEL SERVICE, INC. IN RESPONSE TO
ORDER NO. 3596.

(October 31, 2016)

United Parcel Service, Inc. ("UPS") respectfully writes in response to the Commission's Order No. 3596. See Order Regarding the Postal Service's Motion for Clarification of Order No. 3560 ("Order"), Dkt. No. RM2016-10 (Oct. 28, 2016). In that Order, the Commission gave UPS two options to address the United States Postal Service's ("Postal Service") concerns regarding the risks of inadvertent disclosure of commercially sensitive non-public information in the underlying library reference: either (1) accept the terms of the indemnification agreement proposed by the Postal Service, or (2) request that the underlying library reference be modified to "aggregate and mask mailer specific data." Order at 3-4. UPS here requests the second option: that "the Commission . . . require[] that the Postal Service modify the underlying library reference to aggregate and mask mailer-specific data within five days[.]" *Id.*

UPS further requests that the Commission review the so-modified library reference to ensure that all relevant information is in fact provided by the Postal Service. In accepting this alternative, UPS takes "mailer-specific" to mean only data containing customer or foreign post office names. An overbroad interpretation of "mailer-specific"

could allow the Postal Service to withhold information reasonably necessary to the submission of informed comments in this docket, undermining the Commission's Order. For example, if the Postal Service were to consider geographic origin or piece characteristics to be "mailer-specific," the utility of the scrubbed data would be severely compromised. UPS acknowledges and appreciates that the Commission plans to analyze the revised library reference rather than the originally submitted data. Order at 4. Nonetheless, the Postal Service's aggregation and masking of mailer-specific information should not be used as an excuse for the Postal Service to exclude any information necessary to make informed comments in this docket.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

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